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Mr. Arthur Neel
Director, Program Administration
National Organics Program
USDA-AMS-TMP-NOP
1400 Independence Ave SW
Room 4008-So. Ag Stop 0268
Washington, DC. 20250
Email: National.List@usda.gov

August 15, 2005

Dear Mr. Neel:

This letter is in reference to the National Organic Program, Sunset Review, **Docket Number TM-04-07**.

Clif Bar & Co. thanks the USDA and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. Clif Bar & Co. supports the National List as published and would like to comment specifically on the following materials contained within 205.605:

- **Citric Acid - National List location 205.605(a)**
- **Flavors – National List location 205.605(a)**
- **Wax - Carnauba – National List location 205.605(a)**
- **Sodium bicarbonate – National List location 205.605(a)**
- **Ascorbic acid – National List location 205.605(b)**
- **Glycerin – National List location 205.605(b)**
- **Pectin – National List location 205.605(b)**
- **Potassium carbonate – National List location 205.605(b)**
- **Tocopherols – National list location 205.605(b)**

The comments below describe materials that lend in a positive way to the overall eating experience our consumers have come to expect from Clif Bar & Co. We feel that if the Sunset Provision removes any of the below mentioned materials from the National List it could ultimately lead to the disappearance of certified products from the marketplace, which in turn could negatively affect the organic foods industry. We request that you retain the following materials on the National List.

Name of Substance	Reason for Continued Allowance
Citric Acid	Citric Acid produced by natural fermentation without the use of GMO organisms allows for a specific flavor profile that is not obtainable by using citrus concentrates. Removal of Citric Acid from the National List would have a detrimental effect on the flavor profile of some Clif Bar & Co. products.
Flavors	Natural flavors help provide Clif Bar & Co. products with a flavor profile that has consumer appeal.
Wax - Carnauba	Alternatives to Carnauba Wax have either produced less than desirable textural results or are considered non-vegan and thus not appropriate for a Clif Bar & Co. formulation.
Sodium bicarbonate	Sodium bicarbonate (baking soda) is used primarily to create a desired texture through leavening in some baked products. Alternatives do not yield the same flavor or texture profile as Baking soda. Removal of Sodium bicarbonate from the National List would have a negative impact on texture and flavor for some Clif Bar & Co. formulations.
Ascorbic Acid	Ascorbic Acid is a commonly used substance that provides consumers with Vitamin C supplementation.
Glycerin	Glycerin is a common carrying agent in both organic and organic compliant natural flavors. Additionally, Glycerin is commonly used as a texture enhancer in bars. Glycerin as a carrying agent for flavors and as a textural enhancer performs exceptionally well over the shelf life of a finished product. Removal of Glycerin from the National List would have a detrimental effect on not only the flavor profile for many Clif Bar & Co. products but the overall texture as well.
Pectin	Removal of Pectin from the National List would have a detrimental effect on the texture of certain certified products.

Potassium carbonate	Clif Bar & Co. currently uses Dutch cocoa powder processed with Potassium carbonate (alkalizing agent) in order to meet a specific color and flavor profile. Due to this, it's vital to certain formulations.
Tocopherols	Tocopherols provide additional stability to the nuts used in many of our finished products. Alternatives to Tocopherols are not attractive for use by Clif Bar & Co. primarily because of the negative taste impact from possible alternatives such as Rosemary or Oregano extract.

Thank you for considering our position.

Attachment: "Evaluation Criteria for Substances Added to the National List"
http://www.ams.usda.gov/nop/Newsroom/SunsetDocFedReg06_05.pdf

Respectfully,

Erik Herman

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